

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MEGAN GREEN,)
)
Plaintiff,) Case No. 4:18-CV-01629-JCH
)
v.) JURY TRIAL DEMANDED
)
CITY OF ST. LOUIS, et al.,)
)
Defendants.)

INDIVIDUAL DEFENDANTS' CONSENT MOTION FOR EXTENSION OF TIME

Defendants Cliff Sommer, Nicholas Manasco, Lance Coats, Joshua Becherer, Matt Tesreau, Michael Flatley, Joseph Busso, Jon Long, Timothy Boyce, Bennie Blackmon, Daniel Cora, Joseph Calabro, Lt. Col. Lawrence O'Toole, and Director Charlene Deeken, with consent of plaintiff, move the Court to grant an extension of time to answer or otherwise respond to the second amended complaint. In support, defendants state:

1. The second amended complaint herein [ECF 68] was filed on September 30, 2020. The second amended complaint added the aforementioned individual defendants as parties. Due to internal protocols of the City Counselor and the St. Louis Division of Police, it took considerable time to obtain the necessary permissions and representation agreements to enable counsel to enter for the additional defendants.

2. Counsel from the City Counselor's Office entered for the additional defendants on February 10, 2021. The addition of the individual defendants injects new issues into the case, but, owing to the press of other business, including discovery in related cases pending in this Court and responses to amended pleadings in those cases, counsel have not had sufficient time to prepare a response to the second amended complaint.

3. Plaintiff's counsel advises that there is no objection to this motion.

4. This motion is not for the purpose of delaying disposition of this cause.

WHEREFORE individual defendants respectfully move the Court to grant an extension to and including March 1, 2021, in which to answer or otherwise respond to the second amended complaint.

Respectfully submitted,
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